Remarks/Arguments:

Claims 1-31 and 33 have been cancelled. Claim 32 is pending.

Claims 1-9, 11-14, 16, 17, 19-23, 32 and 33 have been rejected under 35 U.S.C. § 103(a) as being upatentable over Yamada et al. (US 2004/0176095) in view of Chandranmenon et al. (US 2004/0077341). Claims 10, 15, 18 and 24-31 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Yamada et al. in view of Chandranmenon et al. and further in view of Chang et al. (US 7,277,416). Claims 1-31 and 33 have been cancelled. Accordingly, the rejection of these claims is moot. With respect to claim 32, this ground for rejection is respectfully traversed for the reasons set forth below.

Claim 32 includes features neither disclosed nor suggested by the cited art, namely:

> ... establishing a connection of the mobile router to another home agent <u>that does not have the capability to accommodate the mobile router when the mobile router changes operations from those of a mobile router function to those of a mobile terminal function</u>. (Emphasis Added)

Yamada et al. disclose, in Figs. 9-11, a home agent (HA) change judgment processing method for changing a temporary home agent, which mobile node 103 uses when moving among a plurality of foreign networks. Yamada et al. teach that a user of mobile node 103 can set up conditions for changing a temporary home agent. (Paragraphs [0066-0067].) As shown in Fig. 10, home-agent change judgment conditions 1301 include: 1) conditions for performing home-agent change judgment processing 1302 and 2) values (of the number of hops made with temporary home agents 1303, delay 1304, etc.) that are specified as conditions when a change is performed. Home-agent change judgment conditions 1301 are conditions that the user of mobile node 103 <u>sets in advance</u>. (Paragraphs [0068].) As shown in Fig. 11, mobile node 103 judges whether a temporary communication path between home agent 105 and mobile node 103 currently satisfies the conditions under which the home-agent change is performed, based on the change judgment conditions set in advance (1301). If the conditions are satisfied, mobile node 103 judges from the router advertisement whether a temporarily available home agent exists on the foreign network to which mobile node 103 is currently attached. (Paragraphs [0069-0070].)

As acknowledged by the Examiner on page 11 of the Office Action, Yamada et al. do not disclose or suggest establishing a connection of the mobile router to another home agent that

does not have the capability to accommodate the mobile router when the mobile router changes operations from those of a mobile router function to those of a mobile terminal function, as required by claim 32. Thus, Yamada et al. do not include all of the features of claim 32.

Chandranmenon et al. disclose, in Fig. 2, a software architecture of multi-interface mobility client 100, which selects a physical interface based on objective physical characteristics of the interface (signal strength and/or bandwidth) and subjective characteristics (user preferences.) (Paragraph [0028].) Client 100 includes GUI 102 which allows a user to configure the networks for roaming, as well as for other configuration information. (Paragraph [0037].) As shown in Fig. 6, Gui 102 may include screen 600 for the creation and management of user profiles. Selecting one of the rows of configure profile screen 600 produces configuration screen 700, as shown in Fig. 7. (Paragraphs [0101-0105].) Screen 700 is used to configure the profiles, and includes home agent address field 706 that allows the user to enter the address or specify a home allocated address or foreign allocated address. (Paragraphs [0106] and [0109].)

Chandranmenon et al., however, do not disclose or suggest establishing a connection of the mobile router to another home agent that does not have the capability to accommodate the mobile router when the mobile router changes operations from those of a mobile router function to those of a mobile terminal function, as required by claim 32 (emphasis added). Chandranmenon et al. are silent regarding these features.

On page 3 of the Office Action, it is asserted that Chandranmenon et al. include this indicated feature, based on paragraph [0109] and the argument that Chandranmenon et al. "teaches establishing a connection to a home agent by the user directly with an address." Applicant respectfully disagrees. Paragraph [0109] of Chandranmenon et al. recites:

> The home agent address field 706 allows the user to enter the address
> or specify a home allocated address or foreign allocated address.

Accordingly, paragraph [0109] of Chandranmenon et al. only discloses the ability by the user to change home agents. However, Applicant's claim 32 recites establishing a connection of the mobile router to another home agent that does not have the capability to accommodate the mobile router when the mobile router changes operations from those of a mobile router function to those of a mobile terminal function (emphasis added).

Thus, Applicant's claim 32 not only recites establishing a connection of the mobile router to another home agent, but also recites additional limitations of "that does not have the capability to accommodate the mobile router" and "when the mobile router changes operations from those of a mobile router function to those of a mobile terminal function." These additional limitations are neither disclosed nor suggested by Chandranmenon et al. Applicant respectfully notes that all claim limitations must be considered in judging the patentability of that claim against the prior art. (MPEP § 2143.03.) In the Office Action, the Examiner has not addressed where all of Applicant's indicated claim limitations are disclosed or suggested by the cited art. In fact, the only teaching of establishing a connection to another home agent that does not have the capability to accommodate the mobile router when the mobile router changes operations from those of a mobile router function to those of a mobile terminal function comes from Applicant's own disclosure. Accordingly, the Examiner is using "hindsight" in order to reject Applicant's claims. A rejection based on hindsight, however, is impermissible.

In summary, Applicant respectfully submits that the Office Action fails to indicate where all of the features of Applicant's claim 32 are disclosed or suggested by the cited art and that the Office Action fails to provide an articulated reasoning in support of its conclusion that the above features of claim 32 is obvious. Instead, the Office Action relies on features found only Applicant's disclosure.
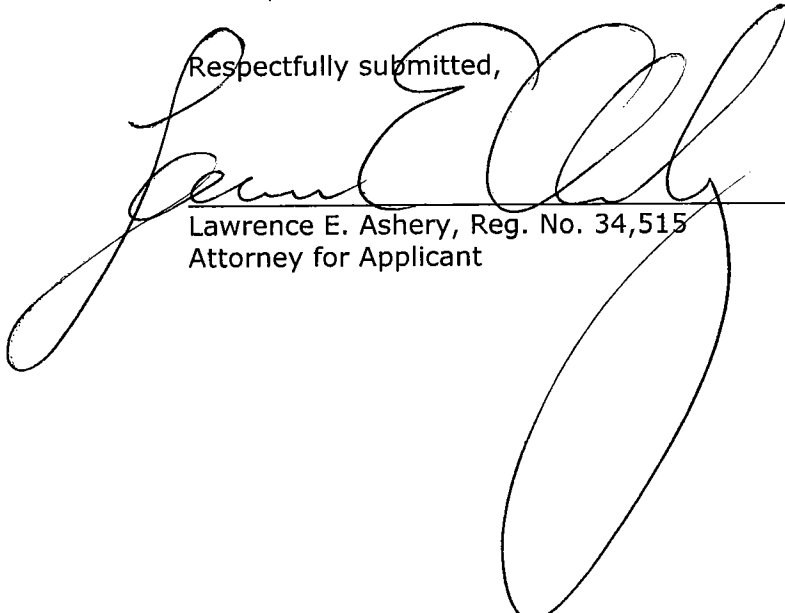
Thus, for the reasons set forth above, Chandranmenon et al. do not make up for the deficiencies of Yamada et al. with respect to claim 32. Accordingly, allowance of claim 32 is respectfully requested.

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Amendment Dated December 2, 2010
Reply to Office Action of September 2, 2010

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In view of the amendments and arguments set forth above, Applicant submits the above-identified application is in condition for allowance, which action is respectfully requested.

Respectfully submitted,

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